

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. NEEDHAM
(OCA/USPS-T39-1-7)
July 18, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

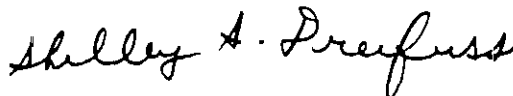
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T39-1. Please refer to your testimony at page 60, lines 13-16.

- a. Please confirm that customers who are ineligible for delivery because they live within one-quarter mile of a non-city delivery office (hereinafter "quarter-mile" rule) cannot obtain a post office box at no charge. If you do not confirm, please explain.
- b. Please confirm that the Postal Service does not offer customers referred to in part a. above one free method of delivery. If you do not confirm, please explain.
- c. Please confirm that Group D fees apply to customers referred to in part a. above. If you do not confirm, please explain.

OCA/USPS-T39-2. Please refer to your testimony at page 60, lines 13-16, concerning customers who live within one-quarter mile of a non-city delivery office. Please confirm that the Postal Service agrees with the following statement of the Postal Rate Commission:

The Commission believes it is equitable to offer one post office box at no charge to any customer ineligible for carrier delivery.

PRC Op. MC96-3, at 62. If you do not confirm, please explain.

OCA/USPS-T39-3. Please refer to your testimony at page 67, footnote 9.

- a. Please describe the nature of the "formal study" to obtain information on the number of customers affected by the quarter-mile rule.
- b. Please describe the scope of work to be performed.

- c. Please identify and describe the entity (or entities) that will produce the “formal study.”
- d. If the entity (or entities) referred to in part c. above is a contractor(s) of the Postal Service, please provide a copy of the statement of work to be performed by the contractor(s).
- e. Please specify the date the “formal study” referred to in footnote 9 will be completed.
- f. Please identify and describe any studies, reports, summaries or other “deliverables” to be provided prior to the completion date of the “formal study.”

OCA/USPS-T39-4. Please refer to your testimony at page 60, lines 10-11.

- a. Please confirm that the Group B fees apply to the post offices listed in DMM section D910.4.3, Exhibit 4.3 under Category 1B. If you do not confirm, please explain.
- b. Please confirm that there are 18 post offices in cities and counties listed in Exhibit 4.3 under Category 1B. If you do not confirm, please explain.
- c. Please confirm that the “eight large cities” referred to on line 11 of your testimony are New York, NY (other than Manhattan); Boston, MA; Philadelphia, PA; Washington, DC; Chicago, IL; Los Angeles, CA; San Francisco, CA; and Honolulu, HI. If you do not confirm, please explain.
- d. Without considering Group A, please confirm that “high-cost ZIP Code areas” are not limited to “eight large cities and their suburbs” in Group B. If you do not

confirm, please explain how you determined which ZIP-code areas are “high-cost ZIP Code areas.”

OCA/USPS-T39-5. Please refer to your testimony at page 66, lines 13-17.

- a. Please confirm that boxholders of size 4 boxes in Groups A and B experienced a fee increase as a result of Docket No. MC96-3. If you do not confirm, please explain.
- b. Please confirm that in Docket No. MC96-3, for the 1996 TYBR, the fees for size 4 boxes in Groups A and B were below their per box cost. If you do not confirm, please explain.
- c. Please explain why mitigating the impact of proposed fee increases is “especially needed” for size 5 boxes in Groups A and B when size 4 boxes in Groups A and B also experienced an increase in fees as a result of Docket No. MC96-3.

OCA/USPS-T39-6. Please refer to your testimony at page 59, Table 11, and page 66, lines 13-17.

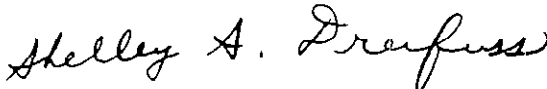
- a. Please confirm that the current fees for size 4 boxes in Groups A and B do not cover their per box cost in the 1998 TYBR. If you do not confirm, please explain.
- b. Please confirm that the proposed fees for size 4 boxes in Groups A and B will cover their per box cost. If you do not confirm, please explain.
- c. Please confirm that size 4 boxes in Groups A and B received a larger percentage fee increase than size 5 boxes in Groups A and B. If you do not confirm, please explain.

- d. Please explain why mitigating the impact of proposed fee increases is "especially needed" for size 5 boxes in Groups A and B, where proposed fees will not cover their per box costs, when proposed fees for size 4 boxes in Groups A and B will cover their per box costs.

OCA/USPS-T39-7. Please refer to your testimony at page 66, lines 13-17. Please confirm that the Postal Service agrees, at least in principle, with the statement: Per box fees should cover per box costs for post office boxes. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
July 18, 1997